October 14, 2004

NRC-04-119
10 CFR 50.90

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Kewaunee Nuclear Power Plant
Docket 50-305
License No. DPR-43

License Amendment Request 208 To The Kewaunee Nuclear Power Plant Technical Specifications

This Licensed Amendment Request (LAR) is being submitted as part of the Nuclear Management Company's continuing effort to improve the quality and consistency of the Kewaunee Nuclear Power Plant Technical Specifications (TS). This LAR affects TS Section 3.10 and Section 6.9.

Enclosure 1 to this letter contains an evaluation of the changes including a Regulatory Safety Analysis and an Environmental Considerations Assessment. Enclosure 2 contains the marked-up TS pages and Enclosure 3 contains the affected (revised) Technical Specification pages.

No new commitments are made as a result of this LAR.

Once approved, it is requested the amendment be implemented within 60 days. If you have any questions or require additional information, please contact Mr. Gerald Riste at (920) 388-8424. A complete copy of this submittal has been transmitted to the State of Wisconsin as required by 10 CFR 50.91(b)(1).

A001

I declare under penalty of perjury that the foregoing is true and correct.
Executed on October 14, 2004.

for

Thomas Coutu
Site Vice President Kewaunee Nuclear Power Plant
Nuclear Management Company, LLC

Enclosures (3)

cc: Administrator, Region III, USNRC
Senior Resident Inspector, Kewaunee, USNRC
Project Manager, Kewaunee, USNRC
Public Service Commission of Wisconsin

ENCLOSURE 1

NUCLEAR MANAGEMENT COMPANY, LLC ,
EVALUATION OF LICENSE AMENDMENT REQUEST 208 TO KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43, DOCKET NO. 50-305

1.0 DESCRIPTION

The Nuclear Management Company (NMC), LLC, proposes to amend the Kewaunee Nuclear Power Plant (KNPP) operating license DPR-43, Appendix A, "Technical Specifications." The License Amendment Request (LAR) will correct administrative errors that exist in TS 3.10.i and TS 6.9.a.4.A.

2.0 PROPOSED CHANGE

The following changes are proposed in this LAR. Marked-up and affected pages showing the proposed changes are located in Enclosures 2 and 3, respectively.

1. TS 3.10.i currently has an omitted word. The omitted word will be added.

2. TS 6.9.a.4.A currently contains incorrect references to TS 3.10. These references will be corrected.

3.0 BACKGROUND

Proposed change to TS 3.10.i

TS 3.10.i currently states that, if the rod position deviation monitor is inoperable, individual rod positions shall be logged once per 8 hours after a load change >10 percent of rated power or after >24 steps of control rod motion. In November 1993, TS Amendment 103 revised TS 3.10.i to change "once per shift" to read "once per 8 hours". During the revision process of TS Amendment 103, the word "and" was inadvertently omitted in TS 3.10.i, between the words "hours" and "after".[2, 3]

Proposed change to TS 6.9.a.4.A

TS 6.9.a.4.A currently contains incorrect references to TS 3.10. These references will be corrected with the license amendment request. In April 2003, TS Amendment 167 (Adams Accession NO. ML030940276) revised TS 3.10, which resulted in the renumbering of items within TS 3.10. TS 6.9.a.4.A includes references to items in TS 3.10 and these referenced items were not updated to reflect the new numbering. Currently, TS 6.9.a.4.A contains incorrect references to TS 3.10.

4.0 TECHNICAL ANALYSIS

Proposed change to TS 3.10.i

TS 3.10.i currently states that, if the rod position deviation monitor is inoperable, individual rod positions shall be logged once per 8 hours after a load change >10 percent of rated power or after >24 steps of control rod motion. In November 1993, TS Amendment 103 revised TS 3.10.i to change what previously read "once per shift" to read "once per 8 hours". During the revision process of TS Amendment 103, the word "and" was inadvertently omitted in TS 3.10.i, between the words "hours" and "after".

It should be noted that Operations Procedure A-CP-46, Abnormal Honeywell Plant Process Computer, currently includes the proposed logging requirements.

Proposed change to TS 6.9.a.4.A

The proposed change to TS 6.9.a.4.A is administrative in nature and is correcting references to TS 3.10. The past issuance of TS Amendment 167 revised TS 3.10; the revision resulted in the renumbering of items within TS 3.10. TS 6.9.a.4.A includes references to items in TS 3.10; upon issuance of TS Amendment 167 the referenced items in TS 6.9.a.4.A were not updated to reflect the new numbering.

Only the actual numbering of the referenced items was incorrect. The titles of the referenced sections were stated correctly; therefore the likelihood for an individual to refer to an incorrect item was minimal.

5.0 REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

The Nuclear Management Company (NMC), LLC, proposes to amend TS 3.10.i and TS 6.9.a.4.A of the Kewaunee Nuclear Power Plant (KNPP) operating license DPR-43, "Technical Specifications." This amendment will correct administrative errors that currently exist within the KNPP Technical Specifications.

The NMC has evaluated whether or not a significant hazards consideration is involved with these proposed amendments. The amendments are strictly administrative in nature therefore no significant hazards exist.

1. **Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?**

   NMC Response for Proposed Change to TS 3.10.i

   No. The NMC has reviewed the proposed change in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. This change is being proposed to correct an administrative error that currently exists within the KNPP Technical Specifications; therefore it would not have an affect on the probability of an accident previously evaluated.

   NMC Response for Proposed Change to TS 6.9.a.4.A

   No. The NMC has reviewed the proposed change in accordance with the provisions of 10 CFR 50.92 to show no significant hazards exist. This change is being proposed to correct an administrative error that currently exists within the KNPP Technical Specifications; therefore it would not have an affect on the probability of an accident previously evaluated.

2. **Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?**

NMC Response for Proposed Change to TS 3.10.i:

No. The proposed change does not alter plant configuration, operating setpoints, or overall plant performance. Therefore, the proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

NMC Response for Proposed Change to TS 6.9.a.4.A:

No. The proposed change does not alter plant configuration, operating setpoints, or overall plant performance. Therefore, the proposed change would not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. **Does the proposed amendment involve a significant reduction in a margin of safety?**

NMC Response for Proposed Change to TS 3.10.i:

No. The proposed change does not involve a significant reduction in a margin of safety. Inclusion of the omitted word "and" in TS 3.10.i will enhance the margin of safety.

NMC Response for Proposed Change to 6.9.a.4.A:

No. The proposed change does not involve a significant reduction in a margin of safety. Correction of the references in TS Section 6.9.a.4.A will enhance the margin of safety.

Conclusion

Based on the above, it is concluded that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c) and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The regulatory bases and guidance documents associated with the changes discussed in this amendment application include:

1. 10 CFR 50.36, "Technical Specifications."

6.0 ENVIRONMENTAL CONSIDERATIONS

Due to this being strictly an administrative change, the NMC has determined that the proposed amendment involves no significant hazards considerations and no significant change in the types of any effluents that may be released offsite and that there is no significant increase in the individual or cumulative occupational radiation exposure. Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.

7.0 REFERENCES

1. 10 CFR 50.36, "Technical Specifications."
2. Letter from Richard S. Laufer (NRC) to C.A. Schrock (WPSC), "Amendment NO. 103 to Facility Operating License NO. DPR-43 (TAC NO. M86926), dated November 5, 1993.
3. Letter from Joseph G. Giitter (NRC) to D.C. Hintz (WPSC), dated October 14, 1988 [Amendment NO. 80]

ENCLOSURE 2

NUCLEAR MANAGEMENT COMPANY, LLC ,
MARKED-UP TS PAGES FOR LICENSE AMENDMENT REQUEST 208 TO
KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43,
DOCKET NO. 50-305

Marked-Up TS Pages:

TS 3.10-6
TS 6.9-3

2 pages follow

g. Inoperable Rod Limitations

1. An inoperable rod is a rod which does not trip or which is declared inoperable under TS 3.10.e or TS 3.10.h.

2. Not more than one inoperable full length rod shall be allowed at any time.

3. If reactor operation is continued with one inoperable full length rod, the potential ejected rod worth and associated transient power distribution peaking factors shall be determined by analysis within 30 days unless the rod is made OPERABLE earlier. The analysis shall include due allowance for nonuniform fuel depletion in the neighborhood of the inoperable rod. If the analysis results in a more limiting hypothetical transient than the cases reported in the safety analysis, the plant power level shall be reduced to an analytically determined part power level which is consistent with the safety analysis.

h. Rod Drop Time

At OPERATING temperature and full flow, the drop time of each full length rod cluster control shall be no greater than 1.8 seconds from loss of stationary gripper coil voltage to dashpot entry. If drop time is > 1.8 seconds, the rod shall be declared inoperable.

i. Rod Position Deviation Monitor

If the rod position deviation monitor is inoperable, individual rod positions shall be logged at least once per eight hours and after a load change > 10% of rated power or after > 24 steps of control rod motion.

j. Quadrant Power Tilt Monitor

If one or both of the quadrant power tilt monitors is inoperable, individual upper and lower excore detector calibrated outputs and the quadrant tilt shall be logged once per shift and after a load change > 10% of rated power or after > 24 steps of control rod motion. The monitors shall be set to alarm at 2% tilt ratio.

k. Core Average Temperature

During steady-state power operation, T_{ave} shall be maintained within the limits specified in the COLR, except as provided by TS 3.10.n.

l. Reactor Coolant System Pressure

During steady-state power operation, Reactor Coolant System pressure shall be maintained within the limits specified in the COLR, except as provided by TS 3.10.n.

3. Monthly OPERATING Report

Routine reports of OPERATING statistics and shutdown experience shall be submitted on a monthly basis to the Document Control Desk, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, with a copy to the appropriate Regional Office, to be submitted by the fifteenth of each month following the calendar month covered by the report.

4. Core Operating Limits Report (COLR)

A. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

(1)	TS 2.1	Reactor Core Safety Limit
(2)	TS 2.3.a.3.A	Overtemperature ΔT Setpoint
(3)	TS 2.3.a.3.B	Overpower ΔT Setpoint
(4)	TS 3.1.f.3	Moderator Temperature Coefficient (MTC)
(5)	TS 3.8.a.5	Refueling Boron Concentration
(6)	TS 3.10.a	Shutdown Margin
(7)	TS 3.10.b.1.A	$F_Q^N(Z)$ Limits
(8)	TS 3.10.b.1.B	$F_{\Delta H}^N$ Limits
(9)	TS 3.10.b.~~4~~ 5	$F_Q^{EQ}(Z)$ Limits
(10)	TS 3.10.b.~~5~~ 6.C.i	$F_Q^{EQ}(Z)$ penalty
(11)	TS 3.10.b.~~9~~ 8	Axial Flux Difference Target Band
(12)	TS 3.10.b.~~11~~ 8.A	Axial Flux Difference Envelope
(13)	TS 3.10.d.1	Shutdown Bank Insertion Limits
(14)	TS 3.10.d.2	Control Bank Insertion Limits
(15)	TS 3.10.k	Core Average Temperature
(16)	TS 3.10.l	Reactor Coolant System Pressure
(17)	TS 3.10.m.1	Reactor Coolant Flow

B. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC. When an initial assumed power level of 102% of the original rated power is specified in a previously approved method, 100.6% of uprated power may be used only when the main feedwater flow measurement (used as the input for reactor thermal output) is provided by the Crossflow ultrasonic flow measurement system (Crossflow system) as described in report (15) listed below. When main feedwater flow measurements from the Crossflow System are unavailable, a power measurement uncertainty consistent with the instrumentation used shall be applied.

Future revisions of approved analytical methods listed in this Technical Specification that currently reference the original Appendix K uncertainty of 102% of the original rated power should include the condition given above allowing use of 100.6% of uprated power in the safety analysis methodology when the Crossflow system is used for main feedwater flow measurement.

ENCLOSURE 3

NUCLEAR MANAGEMENT COMPANY, LLC ,
AFFECTED TS PAGES FOR LICENSE AMENDMENT REQUEST 208 TO
KEWAUNEE NUCLEAR POWER PLANT, OPERATING LICENSE NO. DPR-43,
DOCKET NO. 50-305

Affected TS Pages:

TS 3.10-6
TS 6.9-3

2 pages follow

g. Inoperable Rod Limitations

1. An inoperable rod is a rod which does not trip or which is declared inoperable under TS 3.10.e or TS 3.10.h.

2. Not more than one inoperable full length rod shall be allowed at any time.

3. If reactor operation is continued with one inoperable full length rod, the potential ejected rod worth and associated transient power distribution peaking factors shall be determined by analysis within 30 days unless the rod is made OPERABLE earlier. The analysis shall include due allowance for nonuniform fuel depletion in the neighborhood of the inoperable rod. If the analysis results in a more limiting hypothetical transient than the cases reported in the safety analysis, the plant power level shall be reduced to an analytically determined part power level which is consistent with the safety analysis.

h. Rod Drop Time

At OPERATING temperature and full flow, the drop time of each full length rod cluster control shall be no greater than 1.8 seconds from loss of stationary gripper coil voltage to dashpot entry. If drop time is > 1.8 seconds, the rod shall be declared inoperable.

i. Rod Position Deviation Monitor

If the rod position deviation monitor is inoperable, individual rod positions shall be logged at least once per eight hours and after a load change > 10% of rated power or after > 24 steps of control rod motion.

j. Quadrant Power Tilt Monitor

If one or both of the quadrant power tilt monitors is inoperable, individual upper and lower excore detector calibrated outputs and the quadrant tilt shall be logged once per shift and after a load change > 10% of rated power or after > 24 steps of control rod motion. The monitors shall be set to alarm at 2% tilt ratio.

k. Core Average Temperature

During steady-state power operation, T_{ave} shall be maintained within the limits specified in the COLR, except as provided by TS 3.10.n.

l. Reactor Coolant System Pressure

During steady-state power operation, Reactor Coolant System pressure shall be maintained within the limits specified in the COLR, except as provided by TS 3.10.n.

3. Monthly OPERATING Report

Routine reports of OPERATING statistics and shutdown experience shall be submitted on a monthly basis to the Document Control Desk, U.S. Nuclear Regulatory Commission, Washington, D.C., 20555, with a copy to the appropriate Regional Office, to be submitted by the fifteenth of each month following the calendar month covered by the report.

4. Core Operating Limits Report (COLR)

A. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

(1)	TS 2.1	Reactor Core Safety Limit
(2)	TS 2.3.a.3.A	Overtemperature ΔT Setpoint
(3)	TS 2.3.a.3.B	Overpower ΔT Setpoint
(4)	TS 3.1.f.3	Moderator Temperature Coefficient (MTC)
(5)	TS 3.8.a.5	Refueling Boron Concentration
(6)	TS 3.10.a	Shutdown Margin
(7)	TS 3.10.b.1.A	$F_Q^N(Z)$ Limits
(8)	TS 3.10.b.1.B	$F_{\Delta H}^N$ Limits
(9)	TS 3.10.b.5	$F_Q^{EQ}(Z)$ Limits
(10)	TS 3.10.b.6.C.i	$F_Q^{EQ}(Z)$ penalty
(11)	TS 3.10.b.8	Axial Flux Difference Target Band
(12)	TS 3.10.b.8.A	Axial Flux Difference Envelope
(13)	TS 3.10.d.1	Shutdown Bank Insertion Limits
(14)	TS 3.10.d.2	Control Bank Insertion Limits
(15)	TS 3.10.k	Core Average Temperature
(16)	TS 3.10.l	Reactor Coolant System Pressure
(17)	TS 3.10.m.1	Reactor Coolant Flow

B. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC. When an initial assumed power level of 102% of the original rated power is specified in a previously approved method, 100.6% of uprated power may be used only when the main feedwater flow measurement (used as the input for reactor thermal output) is provided by the Crossflow ultrasonic flow measurement system (Crossflow system) as described in report (15) listed below. When main feedwater flow measurements from the Crossflow System are unavailable, a power measurement uncertainty consistent with the instrumentation used shall be applied.

Future revisions of approved analytical methods listed in this Technical Specification that currently reference the original Appendix K uncertainty of 102% of the original rated power should include the condition given above allowing use of 100.6% of uprated power in the safety analysis methodology when the Crossflow system is used for main feedwater flow measurement.